

EXHIBIT D

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

SAMANTHA ALARIO, HEATHER
DIROCCO, CARLY ANN GODDARD,
ALICE HELD, and DALE STOUT,

Plaintiffs,

v.

AUSTIN KNUDSEN, in his official
capacity as Attorney General of the State
of Montana,

Defendant.

Lead Case No.
9:23-cv-00056-DWM
CV 23-56-M-DWM

Member Case No.
CV 23-61-M-DWM

**DECLARATION OF ALICE HELD
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

I, Alice Held, declare as follows:

1. I make this declaration from personal knowledge.
2. I am a student at the University of Montana, studying applied human physiology with a specialty in exercise metabolism. I live in Missoula.
3. I joined TikTok during the Covid-19 pandemic as a creative outlet to share my outdoor adventures with the world. I fell in love with creating videos about my passions—long-distance running, hiking, mountain climbing, biking, and camping. Over time, my videos grew in popularity and eventually went “viral” when I documented camping for a month during the pandemic. I believe the public enjoyed these videos because people were in need of inspiration and wanted to see new ways of living during this difficult time.
4. I now have over 216,000 followers on TikTok. I continue to create videos about my outdoor adventures, showcasing Montana’s incredible natural beauty. I also use TikTok to connect with others in my community and to discuss important issues, such as exercise, mental health, and sobriety. I believe the app is a valuable resource that can provide a sense of hope and motivation to those who do not have access to traditional therapy. There is also a lot of great fitness content on TikTok that can be done at home or outdoors for those who do not have the means to purchase expensive gym memberships or sporting equipment.

5. I have found greater success on TikTok than other social media apps in terms of gaining followers. For example, while I have over 216,000 followers on TikTok, I only have about 7,000 followers on Instagram. I believe that the TikTok algorithm has allowed me to access a broader audience than I have on other apps.

6. I use TikTok more for my own creative expression and connecting with others than I do for income generation. However, I do generate some income from the app through brand deals.

7. If the Montana TikTok ban is allowed to take effect, I believe it would violate my and other Montanans' First Amendment right to free speech. I think social media can be a powerful tool for connection, hope, and inspiration. Through TikTok, I have had experiences that have shown me that we have a lot more in common than we would ever think. And I believe that discovering that proximity strengthens our humanity.

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Missoula, Montana this 2nd day of July, 2023.



Alice Held